



IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA)	
)	No. 3:22-cr-00327
v.)	
)	
)	
[1] CHESTER GALLAGHER)	
[2] HEATHER IDONI)	
[3] CALVIN ZASTROW)	
[4] COLEMAN BOYD)	
[6] PAUL VAUGHN)	
[7] DENNIS GREEN)	

**MOTION FOR LEAVE TO FILE REPLY MEMORANDUM SUPPORTING
GOVERNMENT'S MOTION TO PRECLUDE IMPROPER ARGUMENTS AND
IRRELEVANT EVIDENCE**

COMES NOW, the United States of America, by and through undersigned counsel (hereinafter, the "Government"), moves the Court to grant leave to file the Reply Memorandum which accompanies this motion, in support of its motion to preclude improper arguments and irrelevant evidence. As the Reply Memorandum sets out, Defendants' response to the Government's motion includes a number of improper requests, as well as characterizations of the Government's positions and statements of applicable law that require clarification.

WHEREFORE, the Government respectfully requests the Court to grant leave to file the Reply Memorandum that is attached, and to which the Court was alerted in the recent status conference on December 19, 2023.

Respectfully submitted,